SANTEN & HUGHES

A Legal Professional Association

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January 7, 2016

VIA HAND DELIVERY

Mr. Harry L. Holbert, Jr. Zoning Administrator Sycamore Township 8540 Kenwood Road Sycamore Township, OH 45236 Board of Zoning Appeals Sycamore Township 8540 Kenwood Road Sycamore Township, OH 45236

Re: John Jasen Dixon
Notice of Violations

To Whom It May Concern:

This letter serves as a Notice of Appeal of the attached citations. My firm's representative carries a check to cover the amount of the BZA appeal fee.

The grounds for the appeal include all of the following: the display is not a "structure" nor an "accessory structure" for purposes of the zoning code and is permitted without any zoning permit; the display is a decorative feature exempted from any height limitation and is permitted without any zoning permit; the display is a permitted sign; the display is a permitted temporary use; the display is a permitted conditional use; the display is appropriate for a variance; any violation has been remedied within the designated time frame; the Township has failed to comply with the provisions of sections 24-1 through 24-4 of the Zoning Resolution; the notice of violation is unripe; the denial of the permit was improper; the requirement of a permit and the denial of a permit violate Dixon's rights under the U.S. Constitution, the Ohio Constitution, and other law; the display requires no permit or other authorization from the Township. Dixon reserves the right to offer other grounds that may exist at law or for which information concerning the same later becomes available.

Mr. Harry L. Holbert, Jr. Sycamore Township Board of Zoning Appeals January 7, 2016 Page 2

With the filing of this notice, Jasen Dixon does not waive any requirement for service imposed by the Sycamore Township Zoning Resolution or other law, and specifically reserves all rights with respect to failure of service.

Sincerely,

SANTEN & HUGHES

Robert Linneman

JRL/sla Enclosures

cc:

John Jasen Dixon

Brian P. O'Connor, Esq.

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